## UNITED STATES DISTRICT COURT WESTERN DISTRICT OF VIRGINIA (ROANOKE DIVISION)

JEFFREY S. MEADOWS,	)
Plaintiff,	)
v.	)
NORTHROP GRUMMAN INNOVATION SYSTEMS, INC.,	) ) Case No. 7:19-cv-00394-MFU
BAE SYSTEMS, INC.,	)
and	)
BAE SYSTEMS ORDNANCE SYSTEMS, INC.,	) ) )
Defendants.	)
DEFENDANT NORTHROP GRUMMAN INNOVATION SYSTEMS, INC.'S MOTION TO DISMISS COUNTS IV & V OF THE AMENDED COMPLAINT	
Defendant Northrop Grumman Innovation Systems, Inc. ("NGIS"), by counsel, and pursuant	
to Rule 12(b)(6) of the Federal Rules of Civil Procedure, moves to dismiss Counts IV & V of the	
Complaint for the reasons set forth in NGIS's supporting Memorandum filed contemporaneously	
herewith.	
	Respectfully submitted,
	NORTHROP GRUMMAN INNOVATION SYSTEMS, INC.
	By: <u>s/James K. Cowan, Jr.</u> Counsel

James K. Cowan, Jr. (VSB 37163) Eric D. Chapman (VSB 86409) CowanPerry PC 250 South Main Street, Suite 226 Blacksburg, Virginia 24060 Telephone: (540) 443-2850 Eacsimile: (888) 755-1450

Facsimile: (888) 755-1450 jcowan@cowanperry.com echapman@cowanperry.com

Counsel for Northrop Grumman Innovation Systems, Inc.

## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and exact copy of the foregoing Motion to

Dismiss was filed via ECF this 24th day of May, 2019:

John R. Thomas, Jr., Esq. Healy Hafemann Magee LLC 11 Franklin Road, S.W. P.O. Box 8877 Roanoke, Virginia 24014 jt@hhm.law

John P. Fishwick, Esq.
Monica L. Mroz, Esq.
Carrol M. Ching, Esq.
Daniel J. Martin, Esq.
Fishwick & Associates PLC
30 Franklin Road, Suite 700
Roanoke, Virginia 24011
john.fishwick@fishwickandassociates.com
monica.mroz@fishwickandassociates.com
carrol.ching@fishwickandassociates.com
daniel.martin@fishwickandassociates.com

Counsel for Plaintiff, Jeffrey S. Meadows

Thomas M. Winn, III, Esq. (VSB # 35758) winn@woodsrogers.com
Joshua R. Treece, Esq. (VSB #79149) jtreece@woodsrogers.com
WOODS ROGERS PLC
10 South Jefferson Street, Suite 1400
Roanoke, Virginia 24011

Telephone: (540) 983-7529 Facsimile: (540) 983-7711

Counsel for Defendants BAE Systems, Inc. and BAE Systems Ordnance Systems, Inc.

James K. Cowan, Jr.